

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PURUSHOTTHAM C. KALOLA,

Plaintiff,

v.

INTERNATIONAL BUSINESS MACHINES
CORPORATION (“IBM”), ET AL.,

Defendants.

Case No.: 13-cv-7339 (VB)

**DECLARATION OF TARA
MERCADANTE IN SUPPORT
OF MOTION TO
WITHDRAW AS COUNSEL**

TARA L. MERCADANTE, being duly sworn, deposes and states, pursuant to 28 U.S.C. §1746:

1. I am an associate attorney at the law firm of Jackson Lewis P.C., attorneys for Defendants International Business Machines Corporation, Sam Palmisano, Robert Weber, Rodney Adkins, Russell Mandel, Kermit Taylor, Kevin Sullivan, Craig Ignaszewski, Vincent Granuzzo, and Bob Murphy in the above-referenced matter. I submit this declaration in support of the instant Motion to Withdraw as Counsel of Record.

2. I am leaving Jackson Lewis P.C. (“Jackson Lewis”) for other employment. My last day with Jackson Lewis is February 6, 2015.

3. Jackson Lewis will continue its representation of Defendants in this matter.

4. Accordingly, I respectfully request Your Honor grant the instant Motion to Withdraw as Counsel and terminate my appearance on the docket.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

JACKSON LEWIS P.C.
220 Headquarters Plaza,
East Tower, 7th Floor
Morristown, NJ 07960
Phone: (973) 538-6890

Dated: February 6, 2015
New York, New York

By: s/Tara L. Mercadante
Tara L. Mercadante, Esq. (TT0684)

ATTORNEYS FOR DEFENDANTS